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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91220180
Party	Defendant Somfy SAS
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Beth E. Cooperstein
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Signature	/Beth E. Cooperstein/
Date	04/11/2016
Attachments	Motion to Extend.pdf(16120 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

The Chamberlain Group, Inc.	Opposition No. 91220180
Opposer,	Mark: SOMFY MYLINK
v.	Serial No.: 86/266,034
Somfy SAS,	
Applicant.	

**CONSENT MOTION TO EXTEND ALL DEADLINES**

Applicant, by and through its undersigned counsel, hereby moves upon consent for an Order extending all deadlines in this proceeding for sixty (60) days. Opposer, by its counsel, has consented to, and joins in, this request.

The parties are currently engaged in settlement negotiations. Specifically, after some initial negotiations, Applicant proposed settlement terms to which Opposer responded. Counsel for the parties conducted a settlement conference on January 5, 2016, after which Applicant then sent follow up questions for Opposer's consideration. Opposer's counsel expects to convey Opposer's substantive response to these outstanding inquiries within the next week.

Accordingly, the Parties' request for an extension of all deadlines is not for the purpose of delay, but for good cause to continue settlement negotiations.

The parties propose the following new deadlines in this proceeding:

<b>Time to Answer :</b>	06/17/2016
<b>Deadline for Discovery Conference :</b>	07/17/2016
<b>Discovery Opens :</b>	07/17/2016

<b>Initial Disclosures Due :</b>	08/16/2016
<b>Expert Disclosures Due :</b>	12/14/2016
<b>Discovery Period to Close :</b>	01/13/2017
<b>Plaintiff Pretrial Disclosures :</b>	02/27/2017
<b>Plaintiff's 30-day Trial Period Ends :</b>	04/13/2017
<b>Defendant's Pretrial Disclosures :</b>	04/28/2017
<b>Defendant's 30-day Trial Period ends :</b>	06/12/2017
<b>Plaintiff's Rebuttal Disclosures :</b>	06/27/2017
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	07/27/2017

As this request is made for good cause and is not made merely for purposes of delay, the Parties respectfully request that the Board grant the consented motion.

April 11, 2016

HOLLAND & HART LLP

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*Attorneys for Applicant Somfy SAS*

**CERTIFICATE OF SERVICE**

I certify that April 11, 2016, I served a copy of the above CONSENT MOTION TO EXTEND ALL DATES to the following by:

<input type="checkbox"/>	U.S. Mail, postage prepaid
<input type="checkbox"/>	Hand Delivery
<input checked="" type="checkbox"/>	Email

Joseph Nabor by email to [Jtnabo@fitcheven.com](mailto:Jtnabo@fitcheven.com)  
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FITCH, EVEN, TABIN & FLANNERY LLP

/s/ Beth E. Cooperstein  
For Holland & Hart LLP

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